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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

STATE OF ALASKA DEPARTMENT OF )  
NATURAL RESOURCES, et al., )  
Plaintiffs, )  
v. ) Case No.: 4:13-cv-00008-RRB  
UNITED STATES OF AMERICA, et al. )  
Defendants. )

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## JOINT STATUS REPORT

In accordance with the Court's July 18, 2023, Order, ECF No. 351, Plaintiffs State of Alaska Department of Natural Resources and Department of Transportation and Public

Facilities (“the State”) and Defendant the United States hereby submit their Joint Status Report.

The State and the United States (collectively, the “Parties”) continue to engage in settlement discussions to determine whether they can resolve this case without the need for protracted litigation. The Parties have made substantial progress on the terms of a possible agreement by exchanging multiple drafts of proposed settlement documents. The Parties require additional time to finalize the language of a draft consent decree. Once counsel for the Parties have agreed upon the language of the recommended consent decree, the consent decree must be reviewed and considered by the appropriate officials within the United States Department of Interior, the United States Department of Justice, and the Alaska Department of Law. If those officials authorize the proposed settlement and approve of the consent decree, the consent decree can be executed and filed with the Court.

Based on the foregoing, the Parties need additional time to finalize language and to seek the required approvals. Accordingly, the Parties respectfully request that the Court continue the stay of proceedings in this matter. The Parties propose to file a Joint Status Report by October 16, 2023 (60 days from the due date of this Joint Status Report), to inform the Court of the status of settlement and to propose any future actions in this case as may be appropriate, including dismissal of this action. The Parties submit that this request will not prejudice any party and will help foster judicial economy in the event that the Parties are successful in resolving the case through settlement.

Respectfully submitted this 16th day of August 2023.

TREG R. TAYLOR  
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/s/ Jessica M. Alloway (with  
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